Pollution Prevention Plan

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Poca Blending
Stormwater / Groundwater
Pollution Prevention Plan

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel property gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Dennis P. Farrell — 6/30/04

Dennis P. Farrell
President

Date

Poca Blending
Stormwater / Groundwater
Pollution Prevention Plan

1.0 INTRODUCTION

The following combined Stormwater / groundwater Pollution Prevention Plan was developed in accordance with the requirements of the State of West Virginia, Department of Environmental Protection, Office of Water Resources, General Stormwater permit ID WVG610882 issued April 1, 2004 to the Poca Blending LLC facility, located in Nitro, WV.

The purpose of the combined storm water / groundwater plan is to identify and implement the effective measures to prevent the discharge of pollutants into storm water run-off or to contaminate groundwater. As part of the preparation of this combined plan, field investigations of the facility's operational, raw material storage, and drum / tote storage areas were performed. These investigations were directed at assessing each facility component with respect to its potential for pollutant discharge or contamination. The investigation results served as the basis for the development of the identified pollution prevention measures.

2.0 FACILITY DESCRIPTION

2.1 Facility Operation and Industrial Activities

Poca Blending, LLC is a chemical blending facility that produces and distributes chemicals for various applications (mainly the mining industry). These chemicals are used primarily for extraction, dust control and freeze protection.

The process chemical encompasses the off-loading of liquid raw materials from tank trucks or rail cars into storage tanks. The liquid raw materials are combined, on a batch basis, with water and other additives in a blending tank to achieve the desired composition and consistency for the final product. The products may then be held in storage tanks before being packaged in drums or totes, or loaded into tank trucks.

The facility typically operates 8 hours per day, 5 days per week. Peak plant operations are 14 hours per day and 6-7 days per week.

2.2 Site Description and Maps

The majority of the facility's raw material storage, blending and finished goods storage is located within the 30,000 ft^2 South end of a shared building at Par Industrial Park in Nitro, WV. The process and storage tanks within the building are located within several secondary containment structures. Some raw materials are stored in an outdoor tank farm, with secondary containment, at the South end of the building. Raw material and finished product transfer operations, between storage tanks, tank cars and tank trucks, are located at 3 points along the West side of the building and one point next to the outside storage tanks.

A U.S. topographical map, which identifies the facility location and boundaries, has been included as Figure 1. Additionally, a site layout map, which identifies facility structures, storage areas, drainage areas and discharge points, has been included as Figure 2.

2.3 Site History

Originally, the industrial park was used as a munitions manufacturing facility. The building that currently houses the plant was a storage warehouse. After the munitions facility was decommissioned. The property was sold to private developers and re-designated for light commercial use. About 15 years prior to the start-up of Poca Blending, the warehouse building was used by a pharmaceutical retail chain for storage of non-perishable retail items.

During the period of three years prior to the inception of the storm water permit, July 18, 2000, there were no known materials of significance that were treated, stored or disposed of in or around the blending facility building. All storm water run-off was collected by a collection trench that discharged to a branch of the storm sewer servicing the entire industrial park area. No structural control, non-structural control, or storm water treatment measures were employed.

2.4 Site Storm Water Run-off Areas & Discharge Analysis

The total area within the facility boundaries is approximately 45,000 ft^2, of which, the building roof comprises approximately 30,000 ft^2, the paved / concrete areas cover approximately 8,000 ft^2, and the grass areas cover approximately 400 ft^2. The building is not equipped with gutters or drain spouts. The East half of the building roof drains beyond the facility boundary over two sets of railroad tracks to a grassy area that slopes away from the building. As a result, the area of impervious surfaces is approximately 26,600 ft^2.

An analysis of the storm water discharges from the industrial activities at the identified facility areas is as follows:

- East Storm water run-off from the East half of the building roof drains beyond the facility boundary over two sets of railroad tracks to a grassy area that slopes away from the building. There is no potential for contamination of or pollution discharge into the storm water run-off because the run-off discharges beyond the facility boundaries without contacting any areas affected by facility activities.
- West Storm water run-off from the West half of the building roof and from the paved areas West of the building discharges into a collection trench that runs parallel to and along the entire length of the building. There is a potential for materials to be spilled or leaked into the trench during transfer operations.
- South Storm water run-off from the grassy area, concrete truck ramp, gravel roadway, and truck dock area to the South of the building accumulates at the bottom of the paved truck ramp (which also serves as a containment area), where it is pumped to the collection trench at the Southwest corner of the building. There is potential for materials to be spilled or leaked on to the truck ramp or gravel areas during the movement or handling of totes or drums.
- North The North end of the building houses other industrial tenants including a waste oil recycle facility and a rail car repair facility. The collection trench that runs along the entire length of the building collects the run-off from these facilities prior to collecting storm water from the Poca Blending facility.

3.0 POLLUTION INCIDENT HISTORY

Since July 1997, there has been one reportable incident involving a spill of less than 100 gallons of acetic acid. The spill occurred on the gravel area during a transfer operation, February 18, 2004. Material was neutralized, and the contaminated soil was removed and sent for disposal. No material entered the storm water collection trench.

4.0 STORM WATER SAMPLING DATA

Table 1 (next page) summarizes the storm water sampling data for the 3 most recent sampling periods.

Table 1

Storm Water Discharge Monitoring Results

Effluent Characteristic	MDL mg/L	Cut-off Concentration mg/L	Results mg/L	Results mg/L	Results Mg/L
			1st half 2004	2nd half 2004	1st half 2005
Aluminum (total rec.)	0.75	0.01	[redacted]	[redacted]	[redacted]
Ammonia	4.0	0.2	ND	[redacted]	ND
Arsenic (total rec.)	0.17	0.03	ND	ND	ND
BOD – 5-day	30	3	8	22	[redacted]
Cadmium (total rec.)	0.016	0.001	ND	ND	ND
Chemical Oxygen Demand	120	3	74	[redacted]	95
Chromium (total rec.)	0.200	0.002	0.003	ND	ND
Copper (total rec.)	0.064	0.003	0.005	ND	0.006
Cyanide (total)	0.064	0.01	ND	ND	ND
Iron (total rec.)	1.0	0.004	[redacted]	[redacted]	1.0
Lead (total rec.)	0.082	0.003	0.05	ND	ND
Manganese (total rec.)	0.064	0.003	0.05	[redacted]	0.05
Mercury (total rec.)	0.0024	0.0002	ND	ND	ND
Nitrate plus Nitrate Nitr.	0.68	0.025	0.40	[redacted]	0.22
Oil and Grease	15	1.6	ND	[redacted]	3.0
pH				6.08	7.31

10/5/05

5.0 STORM WATER MANAGEMENT CONTROLS

The warehouse building at Par Industrial Park is approximately 1500 feet long. The Poca Blending facility is one of several companies with operations located in the building. Only partition walls within the building separate the companies. Running parallel to the building along the entire West side of the building is one continuous storm water collection trench.

In accordance with good engineering practices and applicable storm water protection requirements, Poca Blending has implemented the following storm water management controls and practices to prevent pollution discharge or contamination:

- Pre-release planning / spill prevention (Section 6)
- Spill and leak countermeasures (Section 7)
- Solid and hazardous waste management (Section 8)
- Emergency reporting and response coordination (Section 9)
- Security (Section 10)
- Inspection and monitoring program (Section 11)
- External Factors Planning (Section 12)
- Housekeeping (Section 13)
- Employee training (Section 14)

6.0 PRE-RELEASE PLANNING / SPILL PREVENTION

6.1 Preventive Maintenance Program

1) Repairs that are determined to be required on the facility components (i.e. storage tanks, valves, fittings, transfer lines, etc.) will be reported immediately to the Plant Manager. The Plant Manager will notify the appropriate maintenance and/or outside contactor personnel to initiate any necessary repairs.

2) All preventive maintenance, routine maintenance and equipment inspections will be performed at least quarterly by the appropriate Poca Blending maintenance personnel or, if necessary, qualified outside contractors. Inspection records will be submitted to and maintained by the Plant Manager.

3) Spill response supplies (i.e. absorbent materials, diking materials and protective equipment) are maintained in designated areas throughout the facility.

4) Poca Blending maintenance personnel keep records of all repairs, preventive maintenance, equipment replacement and incidents that

occur in relation to process equipment, structures and process activities.

5) The Plant Manager is responsible for coordinating, developing, implementing and maintaining the Storm Water / Ground Water Pollution Protection Program (SW/GW PPP). The Plant Manager, or his designate, will annually conduct a site inspection to verify that the description of potential pollutant sources is accurate, the drainage map is current, and controls identified in the Plan are being implemented and are effective. After the inspection, the SW/GW PPP will be reviewed to determine its effectiveness and to implement any necessary changes.

6.2 Risk Assessment Analysis

The potential exists for spills or leaks of polluting materials, because of equipment failures, from raw materials storage tanks or process tanks throughout the facility, and tank cars and tank trucks parked at the facility. Packaged goods may spill or leak if punctured during loading or unloading of transport equipment.

Accidental spills would most likely occur due to accidental valve opening, or system plumbing failure. The most likely leak or spill scenarios involve tank transfer operations either between fixed tanks, between fixed tanks and transport equipment or between different pieces of transport equipment. The following procedures and precautions have been implanted to reduce the potential of spills or leaks from polluting storm water run-off or contaminating ground water.

1) The entire area under roof has a concrete floor with no floor drains. A dike along the East side of the building would prevent any spills from exiting that side of the building. Any spills exiting the South side of the building would be collected in the concrete truck ramp/containment area, where it can be pumped into containers. Small berms and walls on the West side of the building prevent any spills from small-capacity containers or small non-diked tanks from exiting the building. The North end of the building has a wall, which separates Poca Blending from other building tenants.

2) All in-service fixed tanks located inside the building, except for a few small-capacity blend tanks, are located on concrete pads and contained within diked areas. The diked areas are designed to hold the entire volume of the largest capacity tank within the dike.

3) Small-capacity blend tanks are located on concrete pads away from building exits, so that any spills from these tanks would be contained within the building.

4) Fixed storage tanks located outside the building are positioned on a concrete pad, within a diked area designed to hold the capacity of the largest tank within the dike. Accumulated rainwater is drained to the truck ramp containment area, and then pumped to the storm trench.

5) All transfers to or from transport equipment are done only on the paved area. The shut-off gate on the storm water collection trench is shut during loading, unloading or transfer operations.

6) All packaged materials, including finished products, raw materials and maintenance materials are stored inside the building in designated areas. Any spills resulting from equipment failure or during use or transfer are contained within the building, and cleaned up as appropriate.

6.3 Procedures Used to Minimize Spills

In an effort to minimize the potential for materials to enter the stormwater or ground water, the following procedures have been implemented:

1) The gate at the end of the storm trench will be closed while the plant is in operation, with the following exceptions:

   a) The gate may be opened if it's raining AND there are no loading or unloading operations taking place, or
   b) If the rain is heavy enough that the gate must be opened during loading or unloading, it may be opened only after all hoses have been connected, valves opened and the loading or unloading has started, and must be closed immediately if a problem occurs and before hoses are disconnected.

2) All tank trailer loading or unloading will be done on the paved area, and the storm trench gate will be closed during such operations.

3) Transloading from one trailer to another will be done at the back loading dock/containment area. The sump will be in the off position during such operations.

4) Rail cars will be top unloaded using air pressure, except for flammable and combustible liquids, which cannot be air-unloaded.

5) Drip buckets will be used under loading or unloading connections, where possible. Material collected in the drip buckets will be emptied into the appropriate tank or tote.

6.4 Material Inventory

The following materials are used, produced or stored at Poca Blending:

1) Acids Acetic acid is the only acid stored in fixed storage tanks. Other acids include sulfuric acid and phosphoric acid, which are stored in 200-500 gal. tote containers. Usually, only a few of these are on-site at any one time.

2) Bases Both sodium hydroxide and potassium hydroxide are stored inside the building in fixed storage tanks. Amines are stored in both fixed storage tanks and totes inside the building. All bulk tanks are diked. Totes are stored in designated storage areas.

3) Petroleum Products Lubricating oils and greases are stored in the facility in small containers and totes. Diesel fuel and kerosene are also stored in 250-300 gal. totes, with a maximum of 10 totes being in storage at any one time. Flammable and combustible materials are stored in a designated area within the building, away from any building exits.

   Bulk storage tanks of high-flash, heavy, petroleum distillates are located in the building within diked areas.

4) Oxidizers Small containers of oxidizers and 250-300 gal. totes are stored within the building away from any combustible materials.

5) Compressed Gases A small number of cylinders of compressed gasses are stored in a designated area. These gases include acetylene, oxygen, nitrogen, argon and propane.

6) Solvents Flammable solvents, such as isopropanol, methanol and D-611 solvent are stored in drums in designated flammable liquid storage areas. Other solvents, some of which are combustible, are stored in the outside storage tanks at the South end of the building.

6) Other Materials In addition to those categories above, other materials contained in inside, diked, bulk storage tanks include fatty acids, emulsions, polyaluminum chloride, glycols, soap solutions and calcium chloride solution. These materials are also stored in drums and tote containers. In addition, there are a variety of maintenance supplies, laboratory chemicals and small-quantity raw

materials that are stored in designated areas as appropriate for their hazard and use.

6.5 Analysis of Spill Potential

Quantities of spills and leaks will be variable depending on cause and container size. A worst-case scenario would involve a catastrophic failure of a tank, which would result in the instantaneous release of the entire contents of the tank. Quantities involved in such a release could be as much as 30,000 gallons. All the large storage tanks located on-site have secondary containment. Although unlikely, a catastrophic failure of a large tank may result in a surge that could propel a significant amount of material over the dike. Even under these circumstances, the berms and walls of the building should prevent any significant amount of material from exiting the building and entering the storm water collection trench. If this occurred while the gate at the end of the storm water collection trench were open, some of the material could be released to surface waters.

Leaks from valves, and lines during product transfer operations will be highly variable as to rate and quantity. As a precautionary measure, it is required that a Poca Blending employee be present during any bulk transfer. The Poca employees are trained on the proper transfer procedures and emergency procedures to be followed to mitigate the damage caused by any unintentional release, and will ensure that proper procedures are followed.

The general site drainage direction is to the West toward a low spot near the center of the facility boundaries (see Figure 2). Pursuant to SW / GW PPP guidelines, a prediction of the direction, rate of flow, and total quantity of pollutants which could potentially be released into the ground or navigable waters of the United States as a result of tank failure, equipment failure, or other external circumstances was performed at the Poca Blending facility.

7.0 SPILL AND LEAK COUNTERMEASURES

Facility components that could potentially discharge polluting materials into the ground water or the navigable waters of the United States are subject to a regular schedule of inspection and maintenance as part of Poca Blending's SW / GW PPP. As described in 6.1 of this SW / GW PPP, all preventive maintenance, routine maintenance and equipment inspections are conducted by Poca Blending maintenance personnel or contractors under direction of the Plant Manager. Spill response supplies (i.e. absorbent material, diking material, protective equipment, etc.) are maintained, which are adequate to respond to most spills or leaks that may occur from on-site facility components. Additionally, 6.2 and 6.3

identify some of the precautionary measures that Poca Blending has taken to prevent accidental releases from discharging into storm water run-off or ground water.

Any Poca Blending employee who discovers a spill or leak of a significant amount of oil or other material is required to:

1) Stop the source of the spill or leak, if safe to do so

2) Dike the area of the spill with absorbent, if necessary to prevent the spill from spreading

3) Follow the spill reporting procedures detailed in 11.0 of this SW / GW PPP

Minor spills are to be cleaned using absorbent materials.

8.0 SOLID AND HAZARDOUS WASTE MANAGEMENT

As a general statement of policy, the Poca Blending facility will minimize the amount of waste that is generated. Poca Blending does not, as part of its normal operations, generate any hazardous waste. Most materials that are not suitable for shipment to customers will be reworked and reprocessed into saleable product. Materials that cannot be reused will be sent to a licensed disposal facility in accordance with all applicable Federal, State and local regulations.

No waste materials will be used for deicing, fills, or other on-site uses.

Non-hazardous refuse is collected in bins designated specifically for that purpose. Waste Management empties the bins once per week. No chemical waste is allowed in the bins except small quantities of tall-oil pitch absorbed on absorbent material. Both Waste Management and the landfill have approved this specific chemical waste for disposal.

All Poca Blending employees are trained in accordance with OSHA HazCom requirements and the requirements of this SW / GW PPP as detailed in Section 14.

9.0 EMERGENCY REPORTING AND RESPONSE COORDINATION

In the unlikely event of a spill of a reportable quantity of a polluting substance, Poca Blending has implemented an emergency response system to efficiently and effectively respond to and control an emergency, spill or leak. The following Sections provide details of the emergency spill control network that has been implemented, including designated

emergency response coordinators, agencies to be notified in the event of a spill, outside spill response contractors, and the internal and external communication systems that have been instituted at Poca Blending.

9.1 Emergency Response Coordinators

The following personnel have been designated as emergency response coordinators for the Poca Blending facility. One of the following is to be immediately notified, in the order listed, of any spill or leak greater than 1 gallon on the gravel area or any uncontrolled spill or leak greater than 1 gallon that may enter the storm water trench.

Plant Manager – Lynn Chapman	(304) 741-0767
Travis Bentley	(304) 741-0883
Maintenance Supervisor – Brian Farrell	(304) 741-0784
Bob Reynolds – Regulatory/Environmental	(919) 649-4753
President – Denny Farrell	(304) 552-2919

The above are familiar with the SW / GW PPP, plant facilities, hazards and characteristics of materials handled in the plant and the use of emergency response equipment and supplies. In addition, these personnel understand the reporting obligations of Poca Blending in the event of a spill or release and have the authority and information necessary to contact outside contractors and government agencies. The coordinators are authorized to commit the necessary resources to carry out the SW / GW PPP in the event of a spill or leak that threatens the environment or human health or safety.

During a SW / GW PPP emergency, the emergency response coordinator will direct all response efforts taken by Poca Blending. He will also facilitate actions that may be taken or ordered by police, fire or other emergency response personnel.

Upon becoming aware that an emergency response situation has developed, the emergency response coordinator will:

- Make a preliminary evaluation of the seriousness of the event
- Determine if a production shutdown is required and so order if deemed necessary
- Determine if the plant must be evacuated, and so order if necessary
- Summon the necessary personnel to mitigate the situation if safe to do so
- Summon outside emergency services if required
- Notify the WV DEP and/or National Response Center if required

During the emergency, the coordinator will, periodically, reevaluate the situation and reassess the response efforts. All steps will be taken, consistent with employee health and safety considerations, to secure the portion of the facility involved, and to contain, control and correct the emergency situation. After the emergency situation has been eliminated, the emergency response coordinator is responsible for cleaning up the site and arranging for disposal of any waste materials generated during the emergency. The emergency response coordinator is also responsible for any post-incident reports that may be required.

9.2 Agency Notification List

Some accidental releases or spills must be reported to government agencies. WV DEP must be notified of any spills that may adversely affect surface water or ground water. The National Response Center must be notified of spills of certain hazardous substances.

Any time a reportable quantity of a hazardous substance is released into the storm trench or onto the gravel area, the National Response Center must be notified within 8 hours. A list of hazardous substances that are present at the Poca Blending facility and their reportable quantity is presented in Table 2.

The reportable quantity is bases on 100% material. To determine the quantity of the substance that was released, take the concentration of the substance (as a decimal) and multiply it by the total number of pounds released. For example, if 4000 pounds of a product containing 20% sodium hydroxide is released, multiply the 4000 pounds by 0.20 to determine that 800 pounds of sodium hydroxide was released, which is NOT a reportable quantity. If there is any question about whether reporting is required, contact Bob Reynolds at (919) 303-5018 or (919) 649-4753 for assistance.

The National Response Center number is (800) 424-8802.

Table 2
Hazardous Substances

Material	Reportable Quantity (lbs)
Acetic acid	5000
Diethanolamine	100
Ethylene glycol	5000
Isobutyl alcohol	5000
Methanol	5000
n-Butanol	5000
Phosphoric acid	5000
Potassium hydroxide	1000
Potassium permanganate	100
Sodium Hydroxide	1000
Sulfuric acid	1000

The WV DEP must also be notified of any release that may require notification to the National Response Center. In addition, the WV DEP must be notified of any spill or release of pollutants that may impact surface waters or ground water. This includes more than minor releases of corrosives, flammables or petroleum products into the storm trench or onto the gravel area.

The WV DEP number is (800) 642-3074.

Local emergency services (police and fire) are available through a "911" system.

9.3 Emergency Response Contractors

Poca Blending personnel have the training and equipment necessary to handle minor spills, which may occur. If outside assistance is necessary, the following outside contractors may be contacted:

CleanHarbors Environmental Services	547-0007 755-9697 266-3231
Hydro IVS Inc.	768-4307 419-1258

9.4 Emergency Communications

A public address system is used to announce an emergency and to provide instructions to plant employees. Employees can access the system by dialing #0 on any hard-wired phone in the plant. If a hard-wired phone is not immediately available, a cell phone can be used to call the office at (304) 755-5737 and asking that an announcement be made.

10.0 SECURITY

Poca Blending has a written Security Plan in compliance with DOT regulations.

11.0 INSPECTION AND MONITORING PROGRAM

Manufacturing areas and facility components that may contribute to a spill or leak of polluting materials are subject to a regular schedule of inspections. The following sections provide details on the inspection and monitoring program that has been implemented to reduce the potential or prevent the accidental release of polluting materials at the Poca Blending facility.

11.1 Storage Tanks

Storage tanks that contain polluting materials are subject to regularly scheduled inspections. Inspections involve a detailed examination of the tank containment structures, pipes, joints, pumps, valves, support structures and controls. These areas are examined for visual signs of mechanical damage, corrosion, leaks, wear, or other conditions that may result in or contribute to a leak or spill. Maintenance and replacement requirements are based on this examination.

In addition to the scheduled inspections, all Poca Blending employees have been assigned the responsibility to monitor their work area for any signs of leaks or spills, or any signs of equipment damage that may cause or contribute to a leak or spill. Leaks, spills or equipment damage are to be reported to the Plant Manager.

11.2 Facility Components and Manufacturing Areas

Facility components or equipment that have the potential to discharge pollutants into the environment are regularly inspected to insure that all components/equipment are operational and functioning properly. Plant operators and/or maintenance personnel ensure that liquid level indicators, overflow alarms and other spill prevention equipment are properly set. Operators check all hose connections, fittings and valves

during the transfer of materials to ensure that there are no leaks or failures.

12.0 EXTERNAL FACTORS PLANNING

Poca Blending is susceptible to external factors (i.e. floods, tornadoes, etc.) that could potentially result in negative effects on public safety and the environment. Other external factors, such as power failures, storms and employee strikes would not have a significant impact on public health and safety or the environment, but would impact production. In the event of a power failure at the facility, all control valves will be manually secured, pumps shut down, and transfer systems turned off. The entire facility can be shut down for extended periods of time without significant impact to public health or safety or risk to the environment.

Because Poca Blending is located near the Kanawha River, flooding presents a potential threat. In the event of major flooding (500-year flood, 100-year storm), the storage tanks and ground-level transformers may be damaged. Flood-borne debris of significant size may impact the outside storage tank area, damaging the dikes and tanks. Inside storage tanks are less susceptible to the impact of flood-borne debris. Significant water-flow may undermine the outdoor storage tanks. Although there is potential for significant flood damage, the likelihood is significantly reduced because all the storage tanks are secured to concrete pads and are diked by concrete walls, the tops of which are well above any expected flood level.

The site is susceptible to the threat of tornadoes. Facility personnel will monitor any weather conditions that may be of concern and, as necessary, secure the plant.

13.0 HOUSEKEEPING

Poca Blending employees are responsible for the general housekeeping in the facility. The following practices have been implemented to ensure good housekeeping:

- Significant discharge incidents are to be immediately reported to the emergency coordinator
- Equipment problems are to be reported to maintenance
- Any liquid material, such as oil or product, spilled on the floor or inside outdoor dike areas, will be immediately cleaned up
- Rain water will be drained from the outdoor dike area before any operations take place in or affect that area and before rainwater accumulates more than 4 inches

- Waste paper and rubbish will placed in waste receptacles
- Personnel washrooms, canteens, locker rooms and surrounding areas will be kept clean and sanitary at all times
- Necessary emergency response equipment and supplies will be kept in stock and in working order
- On-site first-aid supplies will be maintained and available

14.0 EMPLOYEE TRAINING

Employee training related to the SW / GW PPP consists of the following:

- SW / GW PPP Each employee is trained on the requirements of this plan, the importance of pollution prevention, the impact of contamination of Stormwater, and their responsibilities in spill prevention and cleanup
- Hazard Communication Each employee is trained in accordance with the OSHA Hazard Communication Standard, including the hazards of the materials that they work with or may be exposed to, the use of personal protective equipment and the hazards of routine tasks such as spill cleanup
- Security Each employee is trained on the requirements of the Security Plan, in accordance with DOT regulations
- RCRA Employees responsible for waste materials are trained in the EPA requirements for hazardous waste
- Other Emergency response coordinators have additional training and experience enabling them to properly handle spills and emergency situations

15.0 EMERGENCY EQUIPMENT AND SUPPLIES

The following equipment and supplies are maintained at the Poca Blending facility:

- Plug and dike material (for plugging small leaks
- Absorbent pads
- Absorbent
- Chemical resistant gloves
- Safety glasses
- Portable fire extinguishers
- Eye wash stations
- Emergency showers
- First aid cabinet
- Rags
- Shovels
- Waste storage drums

- Spill containment kit

16.0 IMPLEMENTATION

The SW / GW PPP was implemented in July 2002. The latest revision to the plan was completed October 2005, to be implemented immediately.

The revised plan will be made available to Nitro police and fire departments.

Poca Blending

Pollution Prevention Training

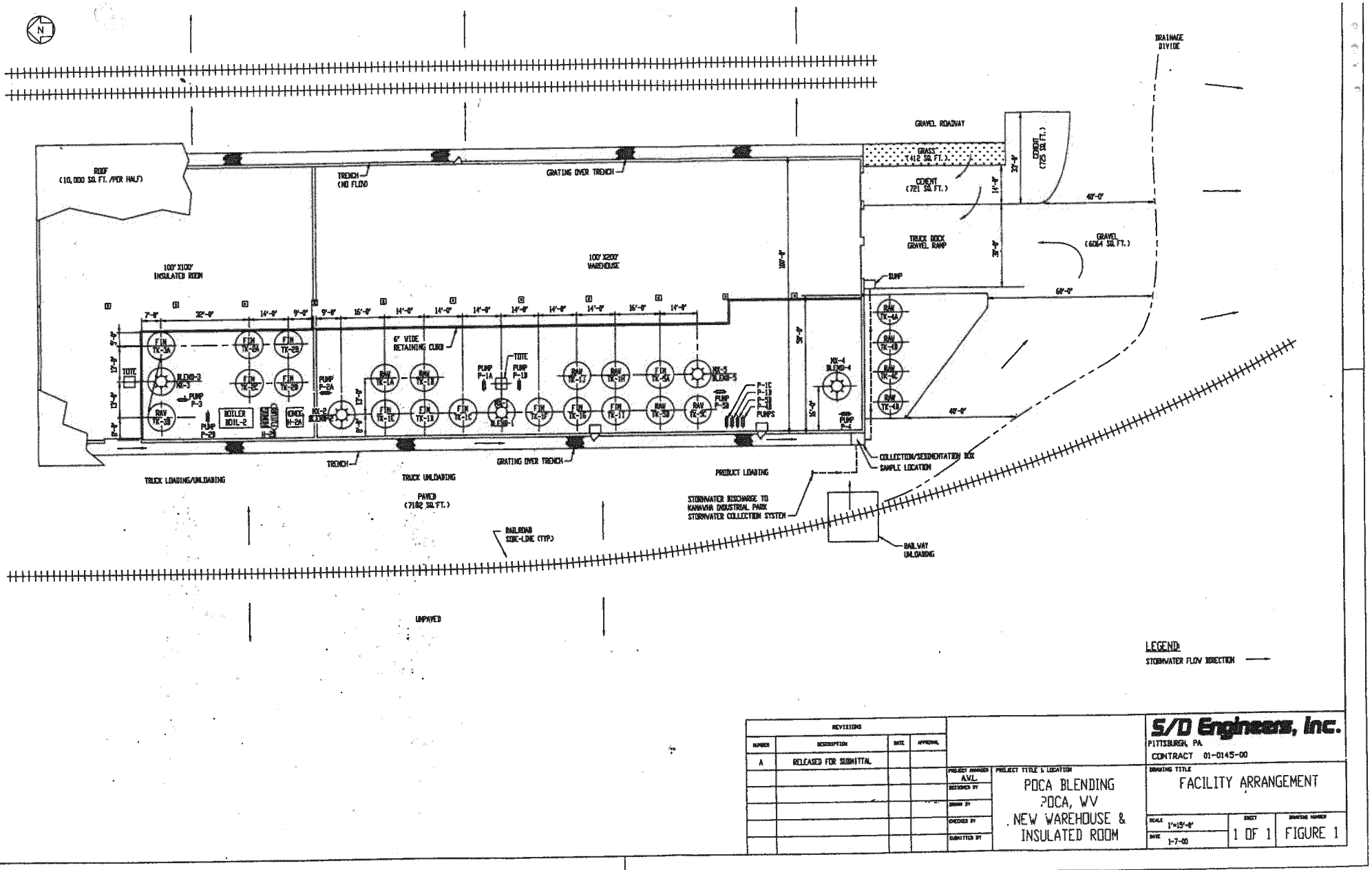
Date of training: September 15, 2004

Conducted by: Regulatory Compliance Services - Robert J. Reynolds

The following employees were trained, on the above date, on the Poca Blending procedures for pollution Prevention.

Employee Name (printed)	Employee Signature	Date
Bill Cauthorn	W. R. Cauthorn	9-16-04
Scottt Ball	Scott Ball	9-16-4
Travis Bentley	Travis Bentley	9/15/04
Lynn Chapman	Lynn Chapman	9/15/04
Brian Farrell	Brian Farrell	9/15/04
Jim Hodges	Jim Hodges	9-15-04
Brian Willard	Brian C Willard	9-15-04
GARY W JONES	Gary Jones	9-15-04

FIGURE 1



REVISIONS			
NUMBER	DESCRIPTION	DATE	APPROVAL
A	RELEASED FOR SUBMITTAL		

PROJECT MANAGER: A.V.L.
DESIGNED BY:
DRAWN BY:
CHECKED BY:
SUBMITTED BY:

PROJECT TITLE & LOCATION
POCA BLENDING
POCA, WV
NEW WAREHOUSE &
INSULATED ROOM

S/D Engineers, Inc.
PITTSBURGH, PA
CONTRACT 01-0145-00

DRAWING TITLE
FACILITY ARRANGEMENT

SCALE 1"=15'-0"
DATE 1-7-00
SHEET 1 OF 1
DRAWING NUMBER FIGURE 1

FIGURE 2